ANCHOR QEA

614 Magnolia Avenue
Ocean Springs, Mississippi 39564
Phone 228.818.9626
Fax 228.818.9631

January 23, 2013

Valmichael Leos
EPA Project Coordinator (6SF-RA)
United States Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

Re: San Jacinto River Waste Pits Superfund Site Time Critical Removal Action
TCRA Cap Maintenance Plan
CERCLA Docket No. 06-12-10
Project Number: 090557-01

Dear Mr. Leos:

You were notified on January 15, 2013 and January 17, 2013 that inspections conducted pursuant to Section 3 the Operations, Monitoring, and Maintenance (OMM) Plan for the San Jacinto River Waste Pits Time Critical Removal Action (TCRA) had identified areas in the Eastern Cell in which maintenance was required. On January 18, 2013, the specific areas were further verified and delineated. This letter is to provide you with a proposed plan for conducting maintenance of the cap, in accordance with the requirements of Section 3 of the OMM Plan.

Figure 1 shows a map of the TCRA Site with the areas that require maintenance (hereinafter referred to as "Maintenance Areas"). Based on the inspection and survey data resulting from the recent quarterly inspection of the TCRA cap, there are five Maintenance Areas in the Eastern Cell with less than the required armor cover thickness. In one of those areas, Maintenance Area 2, there is a need for placement of a geotextile fabric in addition to armor stone.

CAP REPAIR PLAN

This section describes data collection conducted in connection with the cap maintenance and the plans for performing the maintenance, including the following:

- Data collection for cap maintenance planning
- Cap maintenance procedures
- QA/QC procedures during cap maintenance
- Continuing OMM Plan following cap maintenance

Data Collection

Additional survey and cap thickness probing data were collected on January 17 and 18, 2013 around the Maintenance Areas in the Eastern Cell. The survey and probing data were used to delineate the horizontal extent of the maintenance activities and to estimate the required armor stone volume needed to augment the armor layer.

Maintenance Procedures

The affected areas will be addressed by placing additional material in the Maintenance Areas in the Eastern Cell identified in Figure 1. The final cap surface will have at least 12 or 18 inches of armor rock (depending on rock type) covering these areas as required per the Removal Action Work Plan (RAWP).

For Maintenance Areas 1, 3, and 5, it is anticipated that the armor material will be placed from land access points using a small loader (Bobcat, Skid Steer or equivalent) equipment as appropriate, within the horizontal limits delineated for the maintenance activities. The contractor will use placement methods previously approved by USEPA in the RAWP to prevent damage to the geotextile. Depending on tides, the materials may be hand placed.

In Maintenance Area 2, which measures approximately 2 foot by 2 foot, Armor Cap C stone will be placed to achieve a uniform surface at the elevation of the surrounding geotextile. A geotextile fabric which meets the specifications in the RAWP for TCRA cap construction will then be installed over the C stone with a minimum 3 foot overlap on the adjacent geotextile. Armor rock will then be installed over the entire area in the manner similar to that described above for Maintenance Areas 1, 3, and 5.

For Maintenance Area 4, depending on water levels at the time of repair, the armor stone may be placed from water access points using marine-based equipment including, but not limited to, material transport barges; barge-mounted long-reach excavators, and support boats. Water-based rock placement activities may require an off-site load/dock facility and marine transport to deliver the armor cap rock to the TCRA Site. If water levels are low, the armor rock may be offloaded close to Maintenance Area 4 and then land placed, as stated above, into the area requiring maintenance.

The material used for the Maintenance Areas will be sourced from the Armor Cap C and D stockpile that is located approximately 15 miles from the TCRA Site. This material either meets or exceeds the approved design materials for the Maintenance Areas and was purchased and stockpiled expressly for maintenance purposes. As noted in the OMM Plan, the material has previously been tested and approved for gradation and chemistry.

As shown in the typical maintenance detail (Figure 2), Armor Rock C will be placed in Maintenance Areas 1, 2, 3, and 4 to assure the minimum 12 inch design criteria is achieved. In Maintenance Area 5, Armor Rock D will be placed to assure the minimum 18 inch design criteria is achieved as shown in Figure 2.

QA/QC and Reporting

Cap maintenance activities will be observed and documented using the QA/QC procedures provided in the OMM Plan and consistent with procedures used during TCRA construction. Specifically, the following QA/QC procedures will be taken to assure that the cap maintenance activities are in accordance with this Plan:

1. The Maintenance Areas will be clearly laid out with visual markings of the horizontal extent of the work area, using data collected during the surveys described above. The horizontal markings will include grade stakes, rebar, marking paint or similar methods that clearly identify the Maintenance Areas.
2. The quantity of cap material imported from the off-Site stockpile will be recorded. This quantity will be tabulated for each Maintenance Area in a completion summary so that the total of cap material delivery can be quantified. Quantity will be measured in cubic yards, as computed from the capacity of each truck and the estimated percentage full for each load.

3. After each day of work is completed, the surface area (square footage) of cap maintenance will be measured by survey. This area will be compared to the volume imported to confirm that enough material was placed to equal or exceed the minimum required cap thickness.
4. Photographs will be taken daily to document the progress of the work, if at low tide.
5. A daily report will be prepared summarizing the day's work activity. The format of the report and details recorded will be consistent with the daily reports that were generated during TCRA construction.
6. Following completion of the maintenance activities, a survey of the top of cap surface will be performed in accordance with the OMM Plan. This survey will be compared to the survey information described above to document that the required thickness of the cap has been placed in the Maintenance Areas.

Upon completion of the maintenance activities, a maintenance report will be prepared documenting the work as complete, and submitted to USEPA for review and approval.

We request USEPA's review and approval of this plan as soon as possible. Mobilization of the repair response will begin within one business day of USEPA approval of this proposed maintenance plan. We are coordinating with the TCRA contractor, USA Environment, and will keep USEPA informed of the exact start date of the maintenance work. Actual placement will be driven by tides and timing related to mobilizing equipment to the TCRA Site. Please contact us if you have any questions.

Sincerely,

John P. Laplante for David C. Keith
Project Coordinator

cc: Barbara Nann, U.S. Environmental Protection Agency
Philip Slowiak – International Paper Company
David Moreira and March Smith – McGinnes Industrial Maintenance Corporation

FIGURES

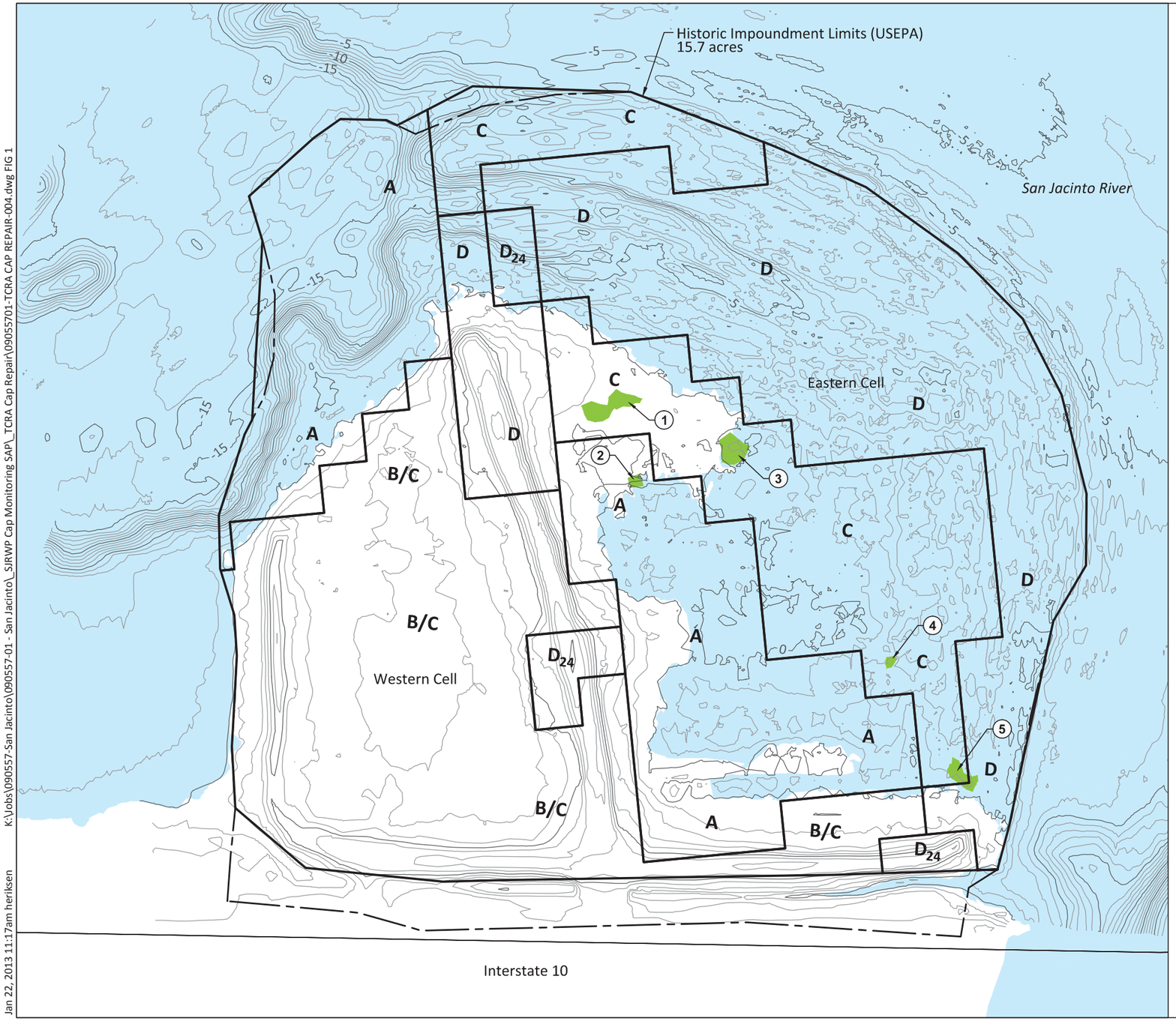
Figure 1 – TCRA Site Map

Figure 2 – Typical TCRA Cap Maintenance Detail

REFERENCES

Anchor QEA, 2011. *Final Removal Action Work Plan*, San Jacinto River Waste Pits Superfund Site. Prepared for U.S. Environmental Protection Agency Region 6 on behalf of McGinnes Industrial Maintenance Corporation and International Paper Company. Revised February 2011.

Anchor QEA, 2012. *Revised Draft Final Removal Action Completion Report*, San Jacinto River Waste Pits Superfund Site. Prepared McGinnes Industrial Maintenance Corporation, International Paper Company, and U.S. Environmental Protection Agency Region 6. March 2012.



LEGEND:

-5 Post-Construction Contour, 10/2012 (1-foot interval)

Historic Impoundment Limit (USEPA)

Maintenance Area

HORIZONTAL DATUM: Texas South Central, NAD83. US Survey Feet.
VERTICAL DATUM: NAVD88.

0 120
Scale in Feet

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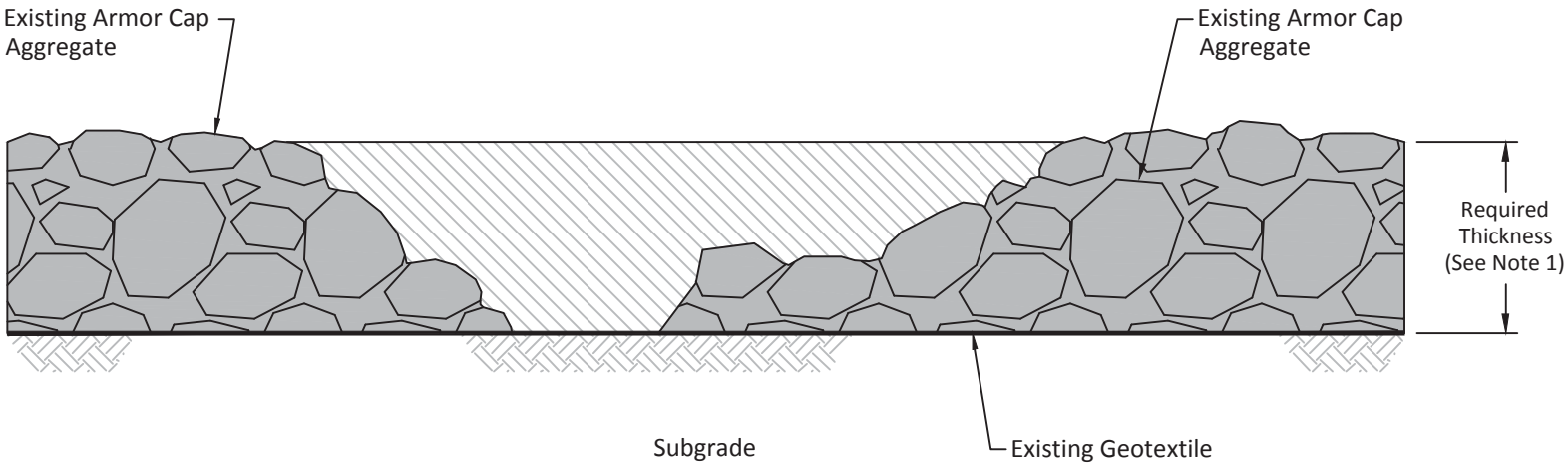
Figure 1
TCRA Site Map
TCRA Cap Maintenance
San Jacinto River Waste Pits Superfund Site



LEGEND:

Additional Overlay of Armor Cap Aggregate

NOTES:

1. Minimum thickness of cap must be at least 12 inches in Armor Cap A and Armor Cap C locations, and 18 inches in Armor Cap D locations.
2. Contractor shall use placement methods that do not damage existing geotextile. Any damage caused by contractor shall be repaired to the owner's satisfaction at no additional cost.
3. Contractor shall use low ground pressure construction equipment and shall minimize maneuvering on the cap surface. Contractor shall repair any visible surface disturbance that was caused by the contractor's operations.
4. Contractor staff operating on site shall be 40-hour HAZWOPER trained.

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Figure 2
Typical TCRA Cap Maintenance Detail
TCRA Cap Maintenance
San Jacinto River Waste Pits Superfund Site